

Submission from Naremburn Progress Association re Beaches Link Tunnel proposal

The Naremburn Progress Association (NPA) has nearly 100 members and is a community group which provides a mouthpiece for residents on issues of local significance. In this role, we must OBJECT most strongly to the Project Proposal and EIS for the Beaches Link tunnel due to the following:

1. No provision of Public Transport alternatives
2. Lack of properly defined Business Case and missing financial details, with superficial “Business Case Summary” conducted by Infrastructure NSW
3. Selection of preferred site or route - no evidence of consideration of other alternatives, and/or why they were rejected
4. No information or analysis re tolling considerations, nor any assurances regarding the continuance of currently toll-free roadways
5. No benefit whatsoever to local residents, with many facing access/egress difficulties to the tunnels due to remote entry/exit portals
6. Impact on amenity
7. Truck movements & associated parking congestion
8. Pollution
9. Child safety
10. Impact on heritage areas, with many potentially affected residences being located in sensitive Local Conservation areas

1. Public Transport Alternatives

The NPA OBJECTS to the continuing premise from the Proponent that the only solution to the area’s traffic congestion is to provide another road. Sydney is already choked with commuters using private motor vehicles who struggle on a daily basis to get to/from work/school/childcare/other engagements in a safe and timely fashion, yet the solution proffered here is to build another road. A far superior alternative would be the development of logical Public Transport alternatives. In this case, if movement of residents to/from the Northern Beaches is the most significant issue then a very real option would be the extension of Metro services from Chatswood via Forestville and Frenchs Forest to Dee Why, including linkage to the Northern Beaches Hospital precinct. Some feedback has been provided by the planners that there are a number of construction and cost issues with this approach without providing detail, but other options might include high-frequency buses (or even trackless trams), removing the need for the large number of vehicles seeking to travel to the CBD and beyond.

Any required upgrades at the Chatswood Transport Interchange could be achieved much more cost-effectively and in shorter timeframes than long distance road tunnels, so this option should be pursued, and Business case completed prior to any further developmental work on the current proposal. It is most unfortunate that a section of State Government-owned land located at the Chatswood Transport Interchange (1-5 Railway Street) and which was previously identified by local community groups as being an important asset to be

retained for such future expansion, was subsequently sold off as being surplus to requirements – a tragic loss of a strategic asset.

2. Lack of proper business case

One of the greatest obstacles to gaining community acceptance of the Beaches Link proposal is the continued refusal of the Proponent to release the Business Case for the Project, so the NPA OBJECTS to this continued refusal. The lack of transparency around these details makes it frustrating to evaluate against other potential alternative solutions, and virtually impossible to conduct any sort of cost/benefit analysis. The ongoing decision to refuse release of the original Business Case must be reversed to facilitate full and frank discussion of all aspects of the Project and a review of any area where community amenity and safety are at risk.

3. Selection of preferred site or route

The community has, over an extended period, been told that there was “no viable alternative” to the Beaches Link reference design. In response, the community has continued to request the provision of information which demonstrates what other options were seriously considered, and the reasons why they were subsequently discarded. Some community members even lodged GIPA requests at their own cost and were subsequently provided with heavily redacted information that was useless.

Infrastructure NSW published a “Final Business Case Summary” of the Western Harbour Tunnel proposal in May 2020 which made many references to the importance and interdependence of the Warringah Freeway Upgrade and Beaches Link projects without providing backup cost data. Benefit Cost ratios, “standard benefits” and associated data are tabled but the net result does little to clarify what real benefits are accrued, to what project do they belong, and are the benefits only realised if all Projects are completed as proposed.

4. Tolling strategy & associated assurances

The NPA OBJECTS to the lack of any tolling strategy details. The EIS confirms that the tunnels will be tolled, but no information has been supplied on this critical consideration. Toll avoidance behaviour can be readily seen around M4 East, M5 East, Bexley Road, Westconnex and Parramatta Road. Similarly, if tolls are too high on Beaches Link then motorists will engage in toll avoidance, leading to “rat running”, with reduced revenues then placing pressure on repayment timeframes. Another strategy mooted in recent times has been consideration of the imposition of tolls on previously toll-free sections of the existing road network, and/or the continuation or reimposition of tolls on roadways where debts had been retired. This is unfair – if all the claimed benefits of Beaches Link really exist then the “user pays” principle should apply. Unfortunately for tunnel users they are faced with the difficult decision of paying expensive tolls, or becoming one of the large number of drivers who elect to put up with ongoing traffic congestion rather than the financial drain of regular (and continually increasing) toll charges. The EIS also confirms Beaches Link as a capacity solution, not a congestion solution – the EIS prioritises freight and through traffic as a goal of the project above local congestion.

5. No local resident benefits

The only local entry points for the Beaches Link are via Artarmon and Berry St, North Sydney so for local residents no travel time saved: 10mins to get to entry, 10 mins in tunnel, 10 mins from exit to Dee Why or Manly = 30 min journey time. Hence the EIS makes it clear that this is not a local congestion solution, especially when the analysis flags several local intersections failing or with a worsened level of service both during and after construction as a result of the project -see Appendix F, Table 3.3.2

The Proposal will not achieve traffic improvement goals – the EIS notes only 10% reduction in the short term on Military Rd based on predicted traffic growth rather than current levels. The traffic model is not made available in the EIS so travel time savings and congestion reductions are unable to be verified. Where a road is already at capacity it is self limiting in that future growth cannot exceed the maximum capacity of the road, hence any travel time saving or reduction cannot be claimed on this basis.

Traffic differential modelling in the EIS shows increased traffic flows around the Warringah Freeway and on the Beaches Link exit portals. The project appears to transfer pinch points to alternate locations rather than solving congestion. A review of surface level traffic with all major local roads included in the operational modelling including Eastern Valley Way, Military Rd and Willoughby Rd was not included. Given Willoughby Road's importance as both a feeder and distributor this inclusion is most important for Naremburn and Willoughby residents as other network routes will have curtailed flexibility when travelling to and around the CBD. The surface road traffic assessment should then inform the pollution impact of the project as the pollution contribution is not only limited to the ventilation stacks.

There are no dedicated bus lanes in the Beaches Link tunnels so the Proposal cannot be considered a public transport solution.

Prior to Covid, TfNSW data shows that the daily average traffic across the Spit Bridge has been decreasing for the last 4 years, while during the same period the traffic on Mona Vale Road through to Macquarie Park has been increasing. The Beaches Link would appear to be addressing an ever decreasing problem as progressively less people travel to and from the city from the Northern Beaches.

The forecasting accuracy of any traffic modelling used can be questioned when noted that base data is from 2014, with population data from 2016 and land use projections based on 2011 data. Claims are made within the EIS that the modelling "incorporates major urban renewal projects" yet ignores the wider effects of significant urban redevelopment projects such as the St Leonards/Pacific Highway 2036 Plan, St Leonards South redevelopment, Herbert St Health Precinct redevelopment and Crows Nest Metro Over Station Development (OSD).

6. Truck movements and associated parking congestion

The NPA OBJECTS to the large number of construction vehicle movements which will be required across the project in servicing the multiple construction sites because these are of

great concern – 900 movements per day for Flat Rock Drive alone. These sites are in and around schools, sporting fields and school transport corridors, increasing the risk to children and staff. From figures within the EIS, Heavy/ Light Construction Movements during the project are as follows:

Table 5-3 Summary of activities proposed at Beaches Link and Gore Hill Freeway Connection construction support sites - Daily vehicle movements:

BL1 Cammeray Golf Course, Cammeray 305/ 275 = 580; BL2 Flat Rock Drive, Naremburn 355/545 = 900; BL3 Punch Street, Artarmon 580/370 = 900; BL4 Dickson Avenue, Artarmon 500/90 = 590; BL5 Barton Rd, Artarmon 120/35 = 155; BL6 Gore Hill Freeway median 100/10 = 110; Total Artarmon = 1755.

BL7 Middle Harbour south cofferdam 60/4; BL8 Middle Harbour north cofferdam combined with foregoing; BL9 Spit West Reserve 200/220 = 420 and vessels 8/16; BL10 Balgowlah Golf Course 1195/ 495= 1290.

Total Additional Vehicle Movements Daily = 4950; Total Addition Vessel Movements Daily on Middle Harbour = 88. NB: The Western Harbour Tunnel and Warringah Freeway project which overlaps with this project between 2023 and 2026 requires another 6343 daily movements between Rozelle and Cammeray.

Of special concern is the 900 additional vehicle movements which will be required on Flat Rock Drive/ Brook St daily. This is a local road which services the connection from Northbridge via Naremburn to the city, and along which dozens of schools on the Lower and Upper North Shore travel daily as their school bus route. Brook St is also a significant active transport link from Willoughby to North Shore schools especially Cammeray, due to zoning. Keeping children of all ages safe along this corridor will be challenging, whilst residents living along the numerous “No Through Road” streets along this corridor and which can only exit onto Brook St will also face a higher risk.

Marshalling areas will be needed for trucks across all sites but particularly at the Flat Rock drive site. Marshalling should not be permitted on local streets and particularly not in the Naremburn Conservation Area due to the increased vibration risk. Trucks should not be allowed to idle while marshalling and every load should be tested and inspected to ensure contaminants are fully contained.

Trucks accelerating from a standing start up a long steep grade are likely to create a substantial amount of diesel pollution, the health impacts of which have not been fully assessed. An alert style monitor should be placed at Bicentennial Reserve to alert the community to high levels of pollutants.

The noise assessment claimed that the trucks on Flat Rock Drive would not create more noise however the assessment does not appear to account for engine braking or sustained use on long steep grades.

Spoil will be taken out from the Cammeray site across the bridge to an unknown location. On return the trucks will need to turn around at an undisclosed point - this may add more trucks to roads around Willoughby than currently documented in the EIS.

7. Loss of amenity

The NPA OBJECTS to the significant loss of amenity resulting from any realisation of this proposal. The area enjoys some high quality sporting facilities (albeit heavily utilised) and very attractive and relaxing bushwalks, all used by large numbers of residents and neighbouring participants, and who face the prospect of the loss of these amenities for 6 years or more, if not forever.

8. Pollution

The NPA OBJECTS to the proposal on the grounds of excessive risk through additional air, water, soil and noise pollution. Despite the commitment to provide large sheds to cover most of the construction activities, uncovering the old landfill rubbish tip will expose the community to potential toxic air and surface runoff pollution, the latter also potentially finding its way into Middle Harbour. Disturbing the landfill will bring with it attendant asbestos-related risks, whilst constant heavy vehicle movements will mean exhaust noise pollution and particulate emissions. All this in an area which, more than 30 years ago, was a rubbish tip but with constant care and attention over the intervening period, is now an area enjoyed by families and bushwalkers alike.

9. Child Safety issues

The NPA OBJECTS to the proposal in view of the significant risks to child safety, especially around the Cammeray Public School area. Not only is the prospect of unfiltered tunnel exhaust stacks a concern for our children's health, but the 70 heavy trucks per hour means children will be at risk when attempting to cross roads travelling to/from school. Both Brook St and Miller St are already very busy so with the additional construction and operational traffic along these routes consideration should be given to the provision of a pedestrian overpass or underpass, at least at Brook St. Project designers need to be aware that Naremburn is part of the drawing area for several large schools, so additional pedestrian safeguards such as crossing guards or heavy traffic exclusion times need to be included in a revised pedestrian safety plan.

10. Conservation area impacts

The NPA OBJECTS to the proposed shallow tunnelling planned for under the Central Township area as much of this area is part of the Naremburn Conservation Area, characterised by 1-2 storey cottages with many heritage features and greatly valued by the community. Recent evidence from similar developments such as WestConnex has provided support to claims of vibration and drawdown damage with tunnelling depths much greater than the 20 metres indicated for under areas such as Garland Road and Slade St, Naremburn. Will TfNSW conduct extensive dilapidation reports at owners request and its own expense on all potentially affected properties, such that any claims arising can be handled in a timely and effective way? How will compensation levels be determined? There

is also a strong likelihood that real estate values in the area will suffer, quite independently of wider market fluctuations – how will these be handled?

Finally, the NPA most strongly OBJECTS to the location of this proposal in the Naremburn area at all. The catch-cry “all pain, no gain” is not an exaggeration as the community will suffer massive dislocation over an extended period owing to a combination of all the factors noted above, yet will enjoy none of the forecast advantages since entry/exit portals to the tunnels are either remotely located, or are virtually inaccessible to local traffic, with localised traffic congestion steadily worsening. The Proposal in its current form is not warranted from a traffic improvement perspective nor would it appear, a financial perspective.

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